

PARTNER

c (631) 806-3762

f (646) 513-2936

e randi@kalmansoncohen.com

January 31, 2025

VIA ECF

Hon. Victoria Reznik, USMJ

United States District Court for the Southern District of New York

300 Quarropas St.

White Plains, NY 10601-4150

Re: *Galvan v. Rolling Lawns, Inc. et al.*, Case No. 7:23-cv-06724(CS)(VR)

Dear Judge Reznik,

We write on behalf of Plaintiff, Nepamuceno Galvan (“Nepa” or “Plaintiff”), in the above-captioned action. Pursuant to Your Honor’s Order dated January 17, 2025, Plaintiff’s memorandum of law relating to ESI (“the ESI brief”) is due today, January 31, 2025. We write to respectfully request the Court’s permission to file our ESI brief under seal in accordance with Rule 5(b) of the Court’s Individual Practices. In his brief, Plaintiff references discovery documents that have been marked “Confidential” by Defendants. Accordingly, Plaintiff respectfully requests permission to file this ESI brief under seal given that it references content in documents that have been marked “Confidential.”

Very truly yours,

/s/ Randi M. Cohen

Plaintiff is directed to follow the Court's Individual Practices, along with ECF Rules and Instructions Section 6, by filing their letter motion to seal in public view and filing the proposed sealed document under seal using a restricted view. Once that is done, the Court will then rule on the letter motion after reviewing the full submission.

SO ORDERED.



Hon. Victoria Reznik, U.S.M.J.

Dated: 1-31-25